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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

JANE DOE 1, et al.

Plaintiffs,

v.

ALEJANDRO MAYORKAS, et al.

Defendants.

Case No. 5:18-cv-2349-BLF-VKD

CLASS ACTION

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO STAY DEFENDANTS'  
ANSWER DEADLINE**

Judge: Hon. Beth L. Freeman

1 WHEREAS the Parties are actively engaged in good faith settlement discussions that may  
2 resolve the remaining disputed legal issues raised in this case;

3 WHEREAS, the Court set April 14, 2021 as the deadline for Defendants to file an answer  
4 responding to Plaintiffs' First Amended Complaint, ECF No. 433 at 24;

5 WHEREAS, Civil Local Rules 6-1(b) and 6-2(a) allow the Parties to request an order  
6 changing the time that would affect the date of an event or deadline already fixed by Court order;

7 WHEREAS, the Parties have conferred via email and teleconference regarding settlement  
8 discussions and the answer deadline; Ex. A, York Decl. ¶ 2.

9 WHEREAS, Plaintiffs communicated to Defendants that they intend to move for further  
10 relief regarding the redaction of the March 15, 2021 Order Granting in Part and Denying in Part  
11 Defendants' Motion to Dismiss, ECF No. 433 (*see also* Order Granting in Part and Denying in  
12 Part Defendants' Proposed Redactions to the Court's March 30, 2021 Order Granting In Part and  
13 Denying in Part Defendants' Motion to Dismiss, ECF 442);

14 WHEREAS, the Parties have reached an agreement that Defendants' deadline to answer  
15 Plaintiffs' First Amended Complaint be stayed to facilitate ongoing settlement discussions, and  
16 that such a stay will not inhibit the Court from considering briefing from the Parties as to the  
17 ancillary issue of Plaintiffs' intended request for further relief regarding redactions to the Court's  
18 March 15, 2021 Order; Ex. A, York Decl. ¶ 3;

19 WHEREAS, the interests of the Parties as well as the Court in avoiding unnecessary  
20 further litigation will best be served by ensuring efficient settlement discussions;

21 WHEREAS, given that settlement discussions are progressing, the Parties request that the  
22 May 20, 2021 Case Management Conference be removed from the Calendar, ECF No. 434;

23 WHEREAS, the Parties similarly request that the Court no longer require the Parties to  
24 file a joint case management statement by May 13, 2021, *see id.*;

25 ACCORDINGLY, it is now hereby STIPULATED AND REQUESTED that the Court  
26 stay the deadline for Defendants' Answer to Plaintiffs' First Amended Complaint, including all  
27 concomitant deadlines related thereto, for ninety (90) days, pending the outcome of the Parties'  
28

1 good-faith settlement discussions; and that such a stay does not prevent Plaintiffs from moving  
 2 for further relief regarding redactions to the Court's March 15, 2021 Order. This stay shall not  
 3 bar either party from requesting the stay be (1) lifted, in the event settlement conversations reach  
 4 a dead end, or (2) extended, in the event settlement conversations are proceeding amicably and  
 5 require additional time. It is further STIPULATED AND REQUESTED that the Court remove  
 6 the May 20, 2021 Case Management Conference from the Calendar, and similarly not require the  
 7 Parties to file a corresponding joint case management statement.

8  
 9 IT IS SO STIPULATED AND REQUESTED.

10 Dated: April 9, 2021

Respectfully submitted,

11  
 12 By: /s/ Belinda S Lee

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23 Dated: April 9, 2021

By: /s/ Kathryn C. Meyer

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Dated: April 9, 2021

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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the signatories hereto.

/s/ Thomas B. York

Thomas B. York

*Attorney for Defendants*

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~~PROPOSED~~ ORDER

Good cause appearing, the above stipulation is approved. PURSUANT TO THE  
STIPULATION, IT IS SO ORDERED.

Dated: April 9, 2021



Honorable BETH LABSON FREEMAN  
United States District Judge